

1.0 PURPOSE

The purpose of this Action Description Memorandum (ADM) is to provide sufficient information to permit a reasonable determination of the level of NEPA documentation required in compliance with DOE Orders 5440.1 C and AL 5440.1 B, "Implementation of the National Environmental Policy Act (NEPA)."

2.0 PROPOSED ACTION

The proposed action is to store an additional 380 yd³ of mixed transuranic waste at the Rocky Flats Plant (RFP). The action will consist of the modification of an existing building to meet the requirements for mixed transuranic waste storage at the Rocky Flats Plant.

2.1 Need for the Action

Due to current storage concerns at the Rocky Flats Plant seven sites have been asked to each provide storage for 380 yd³ of mixed transuranic waste that will be produced at the Rocky Flats Plant in the next five years. Included in these seven facilities is RFP. The Rocky Flats Plant does not currently have any facilities available to store an additional 380 yd³ of mixed transuranic waste. The purpose of the proposed action is to provide near-term RCRA storage for RFP mixed transuranic wastes so the Rocky Flats Plant may continue operations until shipment of mixed transuranic waste to the Waste Isolation Pilot Plant is started.

As of January 5, 1990, the Rocky Flats facility had approximately 803 m³ (1050 yd³ or 3860 drums) of mixed transuranic waste in its inventory and continues to operate under a DOE imposed monthly production restriction of 73 m³/month (95 yd³/month or 349 drums/month) for this kind of waste. This DOE mixed transuranic waste limit does not allow Rocky Flats Plant to complete planned Decontamination and decommissioning (D&D) work, nor some of the planned maintenance activities. The State of Colorado has set mixed transuranic waste capacity limit of 1223 m³ (1601 yd³ or 5882 drums) for the Rocky Flats facility. Because the Rocky Flats Plant will generate at least 15.3 m³/month (20 yd³/month or 73 drums/month) of mixed transuranic waste even during a production shutdown, RFP and the State of Colorado have negotiated a production shutdown when 1139 m³ (1491 yd³ or 5477 drums) of waste are on hand. This production limit allows for an additional 5.5 months mixed transuranic waste generated after production is halted.

The storage of an additional 380 yd³ of mixed transuranic waste will be above the 1601 yd³ mixed TRU waste limit that the plant is currently operating under.

The Department of Energy has requested that seven DOE sites be considered for mixed transuranic waste short term storage. The programmatic impacts of storing 380 yd³ at each of these sites is currently being evaluated in the Environmental Assessment, "AN ENVIRONMENTAL ASSESSMENT OF ALTERNATIVE NEAR-TERM STORAGE FOR RFP MIXED TRANSURANIC WASTE." This EA is being written by Idaho National Laboratory and is currently in draft form.

2.2 Location of the Action

The Rocky Flats Plant is located in northern Jefferson County, approximately 16 miles northwest of downtown Denver, Colorado. The proposed action will be located within the second interior gate of RFP (see figure 1).

2.3 Concise Description of the Proposed Action

The proposed action is to modify room 144 in Bldg. 881 to meet applicable regulations for storage of transuranic mixed waste. Room 144 is approximately 4,600 sq ft. These modifications would include:

- Upgrade the fire sprinkler system
- Install sumps and pump floor drains to process water
- Construct clothing change/decon area
- Repair cracked concrete
- Construct/modify supply plenum
- Install criticality and SAAM alarm system
- (possibly) Shielding for the adjacent laboratory

Room 144 is scheduled to be used for a maintenance shop. The shop has not yet been moved into 144 but the shop will need to be put somewhere. The relocation of this shop could entail several moves by several groups, within and outside of Bldg. 881, in order to accommodate the requirements for the maintenance shop. There is a laboratory located adjacent to the proposed storage location. The effects of storing MTRU waste near this lab will need to be examined in greater detail in order to determine the level of shielding that may be required for the successful operation of the lab.

2.4.1 No Action

The no action alternative is to install the maintenance shop in room 144, and to not provide additional storage for Mixed TRU Waste at RFP. This would force DOE to find additional storage for Mixed TRU Waste outside of RFP.

2.4.2 Other

Construction of a new storage site for mixed transuranic waste. The time constraints for the proposed action preclude this option. The anticipated date of completion for a new residue drum storage facility is June 1996. Rocky Flats transuranic waste would exceed the 1601 yd³ limit, that has been set by the State of Colorado, prior to completion of a new facility.

Storage of mixed transuranic waste in building 371. This alternative was rejected due to the lack of space for mixed transuranic waste storage in 371. Space could be found for 327yd³, not the 380 yd³ that are required.

Storage of mixed transuranic waste in building 664, high bay area. There is only enough space in this area to store 12.3 m³ (16 yd³ or 60 drums).

Storage of mixed transuranic waste in room 138 Bldg. 883. This option is viable but not recommended due to the nature of room 138. Room 138 is an annex to Bldg. 883 and would require major modifications in order to meet mixed transuranic waste storage requirements.

Storage of mixed transuranic waste in ATMX rail cars. This is not expected to be a publicly viable alternative.

4.1.2 Operations

Any hazardous or mixed waste that might be generated as a result of this action will be handled in accordance with the requirements of RCRA as implemented in the Colorado Hazardous Waste Regulations.

4.2 National Pollutant Discharge Elimination System (NPDES)

The proposed action will not impact generated liquid effluents and therefore, will not impact the Plant Environmental Protection Agency National Pollutant Discharge Elimination system permit.

4.3. Clean Air Act (CAA)

The proposed action will not impact airborne emissions of hazardous materials.

4.4 NEPA Specific Considerations

The proposed action is categorized as further development within Rocky Flats Plant (RFP) site. There will be no adverse effect on:

- Wetlands
- Floodplains
- Historical, Cultural or Archaeological Resources
- Threatened and Endangered Species

Consultation with the U.S. Army Corps of engineers was conducted in the fall of 1989. The general location of jurisdiction wetlands on plant site were characterized. It has been subsequently determined that the proposed action is not located in, nor in a position to have an effect upon, known jurisdictional wetlands.

The proposed action is not located in a designated 100-year floodplain.

In a letter to A.E. Whiteman, Manager of the Department of Energy Rocky Flats Area Office, the Colorado State Historical Preservation Officer, B. Sudler, stated that, "There will be no effect to significant cultural resources by further development within Rocky Flats Plant, provided [two specified sites] are avoided." These sites were identified in *An Archaeological and Historical Survey of selected parcels within the Department of Energy, Rocky Flats Plant*, and will not be affected by the proposed action.

The USFWS has identified the bald eagle and the black-footed ferret as endangered species of interest at the plant. This action would not be considered to impact the bald eagle habitat. Surveys for black-footed ferrets would be required only if prairie dog colonies would be affected. The proposed action is not to be in an area of current or potential colonization by prairie dogs. The proposed action will not impact Indian lands or religious sites.

5.O FISCAL AND SCHEDULE INFORMATION

The total estimated cost of this action is: 1,1 60K for construction

500K for Safety Analysis Report

50K for Operational Safety Review

6K for QA program

Total cost = 1,71 6K (not including NEPA costs, cost of relocating displaced functions or cost of additional shielding that may be required)

The funding source of the proposed action has not yet been determined.

The first year of funding is planned for FY91 with completion estimated by FY92.

6 . O ADDITIONAL DOCUMENTATION

Until the NEPA process is complete on the EA "AN ENVIRONMENTS ASSESSMENT OF ALTERNATIVE NEAR-TERM STORAGE FOR RFP MIXED TRANSURANIC WASTE" the implications of CEQ 1506.1, "Limitations on Actions During the NEPA Process," may be of interest.

